

EXHIBIT B

3790-3

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

In re:)
JUUL LABS, INC., MARKETING,)
SALES PRACTICES, AND PRODUCTS)
LIABILITY LITIGATION)
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)
)
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)
)
CASE NO.
3:19-MD-02913 WHO
_____)

VIDEOTAPED DEPOSITION OF
KAYA LEHR-LOVE

San Francisco, California 94104

Sunday, October 23, 2022

Reported Stenographically by:
MARY J. GOFF
CSR No. 13427
WA CSR No. 21030799
Job No. 218679

1 Q And what do you recall them saying?

2 A "It's just water vapor."

3 Q Do you have an understanding of why they
4 believed it was just water vapor?

5 ATTORNEY BRANE: Object to form.

6 A That's what they had heard.

7 Q (BY ATTORNEY YOUNG) Do you know who they
8 heard that from?

9 A It wasn't specified, a who. It was just
10 generally known by kids that it was just water
11 vapor.

12 It wasn't that one specific person told
13 them. It was just that that's what they knew.

14 Q Have you ever seen a JUUL product package?

15 A Yes.

16 Q Do you recall the language on -- strike
17 that.

18 When was the first time that you saw a
19 JUUL product package?

20 A I don't recall.

21 Q Do you recall the last time that you saw a
22 JUUL product package?

23 A I also do not recall.

24 Q But you do recall at some point having
25 seen JUUL product packaging; is that right?

1 Washington. What do you know about student use of
2 e-cigarettes at George Washington High School?

3 A I knew that it was a problem over there as
4 well.

5 Q What is your basis for your knowledge that
6 it was a problem at George Washington High School?

7 A I had friends that went to George
8 Washington that would tell me about what was going
9 on over there.

10 Q Who are your friends that went to George
11 Washington?

12 A I have a friend named Adam who went there.

13 Q Anyone else?

14 A And he had a friend group that he
15 introduced me to, but I don't remember everyone's
16 names.

17 Q And which specific people told you about
18 e-cigarette use by students at George Washington
19 High School?

20 ATTORNEY BRANE: Object to form; asked and
21 answered.

22 A My friends that I knew from Washington.
23 And also on that YOW day I was talking about
24 earlier, that I discussed e-cigarette and vaping
25 issues that were going on at other schools.

1 Q (BY ATTORNEY YOUNG) Now, you did not
2 attend George Washington High School, right?

3 A I did not attend George Washington High
4 School.

5 Q So everything you know about student
6 e-cigarette use at George Washington High School is
7 stuff you learned from other people; is that right?

8 A Yes.

9 Q Is it the same for Lowell High School?

10 A Yes.

11 Q So everything you know about e-cigarette
12 use by students by Lowell High School is stuff you
13 learned from other people; is that right?

14 A Yes.

15 Q Same for Balboa?

16 A Yes.

17 Q Same for SOTA?

18 A Yes.

19 Q Same for Mission?

20 A Yes.

21 Q Same for Burton?

22 A Yes. Burton, I think. Burton is -- not
23 Barton. Burton.

24 Q How do I spell that?

25 A I believe it would be B U R T O N. I'm

1 not the best speller as well so...

2 Q So would it be Burton?

3 A Burton.

4 Q Okay. Thank you for clarifying that.

5 When exactly did you witness vaping use by students
6 take off at -- in SFUSD schools?

7 A Can you ask that question again?

8 Q Sure. So in paragraph 4, you wrote:

9 In my time at ALHS, I
10 witnessed vaping use by students
11 take off in SFUSD schools.
12 Right?

13 A Um-hum.

14 Q When exactly did you witness vaping use by
15 students take off in SFUSD schools?

16 A Around my junior and senior year is when
17 it was noticeable.

18 Q So your junior year was the 2016-'17
19 academic year; is that right?

20 A Yes.

21 Q And then the senior year was the 2017-'18
22 academic year; is that right?

23 A Yes.

24 Q Did you witness students vaping at Abraham
25 Lincoln High School when you were a first-year

1 anticigarette and antinicotine.

2 So when I mean antitobacco, I mean
3 anticigarette and nicotine, but they were convinced
4 otherwise.

5 Q You said that these students thought that
6 the risk was worth it; is that right?

7 A Yes.

8 Q So did they know that using e-cigarettes
9 was risky?

10 ATTORNEY BRANE: Object to form.

11 Q (BY ATTORNEY YOUNG) Strike that. Let me
12 ask again. Is it your understanding that they knew
13 that e-cigarette use was risky?

14 ATTORNEY BRANE: Object to form.

15 A To my understanding of a few people I
16 talked to, they knew the logical risks of it, but
17 other people didn't know the logical risks of it.

18 Q (BY ATTORNEY YOUNG) And the people that
19 told you about the logical risks of it, what were
20 the logical risks?

21 A That it was addictive and it was bad for
22 your health.

23 Q Do you have an understanding of why they
24 believed it was addictive?

25 A I do not have an understanding of why they

1 and I didn't want to get addicted to nicotine.

2 Q Did you ever tell Adam that you believed
3 they were unhealthy?

4 A Yes.

5 Q And did you ever tell Adam that they
6 contain nicotine?

7 A Yes.

8 Q When you told me Adam that they were
9 unhealthy, what was Adam's reaction?

10 A He knew that they were unhealthy, but it's
11 what was cool. And he was very concerned with how
12 other people saw him and wanting to fit in.

13 Q Is it your understanding that -- strike
14 that.

15 Is it your understanding that Adam chose
16 to use JUUL because he thought it would help him fit
17 in with other students?

18 A I believe that was part of it.

19 Q Do you have an understanding of what else
20 would have motivated -- strike that.

21 Do you have an understanding of what else
22 motivated Adam to use a JUUL?

23 A He told me that once he started, he
24 couldn't stop; and he was scared.

25 Q Did you ever advise him to get help?